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State of Maine Public Drinking Water Commission 2011 Annual Report

Maine Department of Health and Human Services

Maine Center for Disease Control and Prevention

Maine Public Drinking Water Commission

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STATE OF MAINE
PUBLIC DRINKING WATER COMMISSION



2011 ANNUAL REPORT
YEAR ENDING JUNE 30, 2011

**Annual Report
of the
Maine Public Drinking Water Commission**

for the period ending
June 30, 2011

Table of Contents

Introduction.....	3
Enabling Legislation.....	3
Members of the Maine Public Drinking Water Commission.....	4
Drinking Water Program Organizational Chart.....	5
Performance Review of the Drinking Water Program.....	6
MPDWC Objectives for the Coming Year.....	6
Acknowledgements.....	6
Alternative Funding Mechanism.....	7
Types of Public Water Systems Regulated by the DWP.....	8
Fee Billings and Collections.....	9
Drinking Water State Revolving Fund.....	9
Annual Staff Meeting and Annual Staff Merit Award.....	10
DWP Program Accomplishments and Goals.....	11
Director's Report.....	11
Compliance and Enforcement Team.....	13
Field Inspection Team.....	15
Water Resources Team.....	18
Information Management Team.....	23
Laboratory Certification and Capability.....	25
Maine DWP Budget Projection.....	Appendix A

Introduction

The Annual Report of the Maine Public Drinking Water Commission (MPDWC) has been prepared for the Commissioner of the Department of Health and Human Services pursuant to Title 22 MRSA Section 2660-C 4th. The purpose of the report is to provide the Commissioner with an understanding of the issues the MPDWC and the Maine CDC 's Drinking Water Program (DWP) have dealt with during the last year and to outline the goals and work for the upcoming year. This report contains information about the DWP and its operations, with reports from the DWP Director and the Compliance and Enforcement, Field Inspection, Water Resources and Information Management Teams. Background information about the regulated water systems is also provided, along with the current fee structure in place and an explanation of the Drinking Water State Revolving Fund. Copies of this Annual Report are also submitted to the members of the Health and Human Services Committee of the Maine Legislature.

Enabling Legislation

Legislation relating to the MPDWC is found in Title 22 MRSA § 2660-B et seq. The statutes were first established in 1993(c.410) and have been modified five times since (1995.c.581: 1995.c.21: 1997.c.705: 2001.c.232 and 2003.c.601).

The legislation includes Definitions, Membership Requirements, Chair Responsibilities, Duties, Compensation, an annual work plan submission to the DHHS Commissioner and the Authority to impose an annual public water system operation fee.

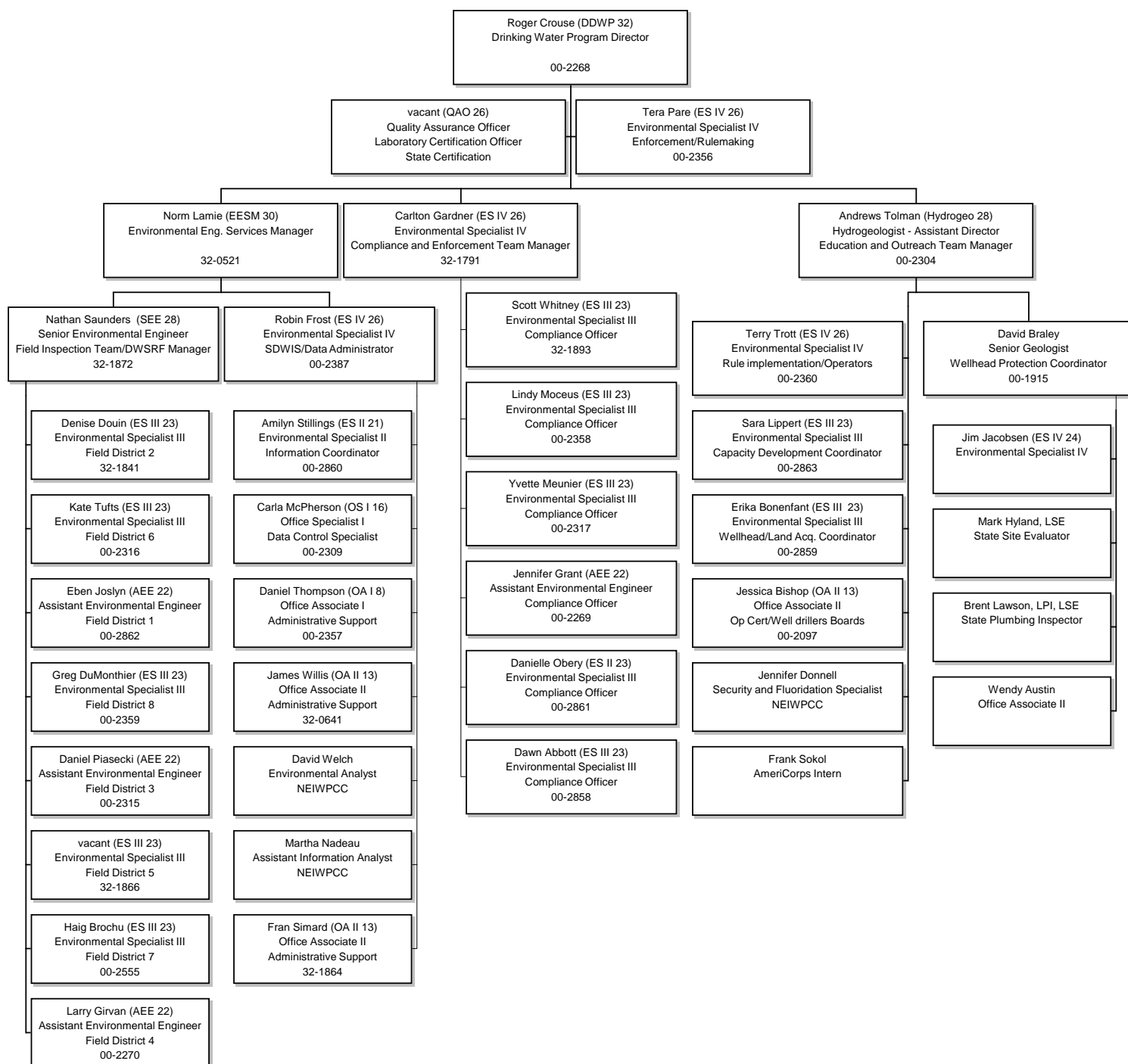
Members of the Maine Public Drinking Water Commission

Name, Address, E-Mail	Seat # Expiration Date	Statutory Provisions for Seat
Roger L. Crouse, P.E. Director, Maine CDC Drinking Water Program 11 State House, Station Augusta, ME. 04333-0011 287-5684 FAX 287-4172 E-mail: roger.crouse@maine.gov	Seat 1 Until Replaced	Commissioner of Health and Human Services or the Commissioner's designee
Rebecca Laliberte The Meadows PO Box 629 Greene, ME 04236 946-3007 E-mail: RLalib3967@aol.com	Seat 2 August 31, 2011	Represent the water purveying community and be associated with a public water system serving a population of not more than 1,000.
Thomas J. Brennan, C.G., <u>Chairperson</u> Nestle Waters North America – Poland Springs 123 Preservation Way Poland Spring, Maine 04274 998-6350 ext. 6350 FAX: 998-5181 E-mail: thomas.brennan@waters.nestle.com	Seat 3 August 31, 2009	Must represent the drinking water public
Robert N. MacKinnon, Jr. Yarmouth Water District, Superintendent PO Box 419, 14 Smith Street Yarmouth, ME 04096 846-5821 FAX 846-1240 E-mail: ywdbob@maine.rr.com	Seat 4 August 31, 2011	Represent the water purveying community and be associated with a public water system serving a population of at least 1001, but not more than 10,000.
Vacant	Seat 5	Represent the water purveying community and be associated with a public water system serving a population greater than 10,000.
Allen York 221 Lakewood Road Madison, ME 04950 474-7353 E-mail: yonderhill@beeline-online.net	Seat 6 August 31, 2009	Must be a user of a transient, non-community water system
Harvey A. Chesley, Jr. 25 Hill Crest Drive Clinton, ME 04927 397-2141 FAX 397-5324 E-mail: ptchc@gwi.net	Seat 7 August 31, 2012	Must be a user of a non- transient, non-community water system
George Dugovic PO Box 603 Alfred, ME 04002 324-0180 E-mail: dugovics@roadrunner.com	Seat 8 August 31, 2011	Must represent the drinking water public
Vacant	Seat 9	Must represent the drinking water public

Drinking Water Program Organizational Chart

DRINKING WATER PROGRAM, DIVISION OF ENVIRONMENTAL HEALTH, MAINE CDC ORGANIZATIONAL CHART

July 26, 2011



Performance Review of the Drinking Water Program

The MPDWC gets regular updates from the DWP, and assesses the performance of this State agency. Despite shut-down days and suspended merit increases, the Director and the staff of the program are performing extremely well, given the ongoing budget and staffing constraints. Regulations and reporting requirements for drinking water systems continue to evolve and increase under the direction of the EPA, and the DWP continues to handle these increased responsibilities, although not without its challenges. In addition, the DWP has done an excellent job continuing to work with the regulated community to creatively navigate challenges in securing federal matching dollars for the State Revolving Fund. Organizational changes made within the program over the past few years continue to improve service to Maine's water systems and allowed greater field work to insure the safety and reliability of our Maine water systems.

MPDWC Objectives for the Coming Year

The Maine Public Drinking Water Commission will continue to support and guide the Drinking Water Program, as needed, and to continue to prudently oversee the alternative funding mechanism established to fund a portion of the program's budget. However, staffing and funding will continue to be large, and growing, issues for the program. To that, the Commission in the upcoming year will:

- Continue to work toward greater State general funding to support needed positions, through meetings with administration and/or legislators as well as others in the Drinking Water Community
- Continue to support and work for the appropriate funding for the State match of the Drinking Water State Revolving Fund
- Be a resource and an advocate for the DWP, its director and its staff
- Be knowledgeable of changing State attitudes and rules regarding the use and planning for Maine's water resources, and participate as needed in shaping new policy

Acknowledgements

The Drinking Water Commission would like to once again acknowledge the hard work and dedication of all employees of the Drinking Water Program. There is clearly a culture of Teamwork within the organization that is a testament to the leadership of Roger Crouse, the Director. As water issues continue to escalate nationally, statewide and locally, the stretched staff of this program quietly and efficiently do everything they can to protect the safety and reliability of Maine's over 1,900 water systems as they *Work Together for Safe Drinking Water*.

Alternative Funding Mechanism

In 1993, the Legislature created legislation enabling the DWP to assess a fee on all public water systems. This fee is deposited in the Public Drinking Water Fund for the purpose of supporting the DWP. The fee, also known as the Alternative Funding Mechanism, is calculated using a formula with a base rate and a population multiplier.

The Alternative Funding Mechanism pays the costs of five full-time employees. Each year the MPDWC reviews the formula, the base fee, the per capita fee and the DWP budget to determine if any changes need to be made to the formula or fee rates. Revenues derived from the collection of these fees are used to retain primacy, or maintaining state control of the DWP, including funding five DWP staff positions.

For all water systems except bottled water and vending machines, the fee is equal to the minimum fee plus the per capita rate, multiplied by the population capacity of the system, minus the exempt population.

A summary of the rate structure for these types of water systems can be found in Table 1 below.

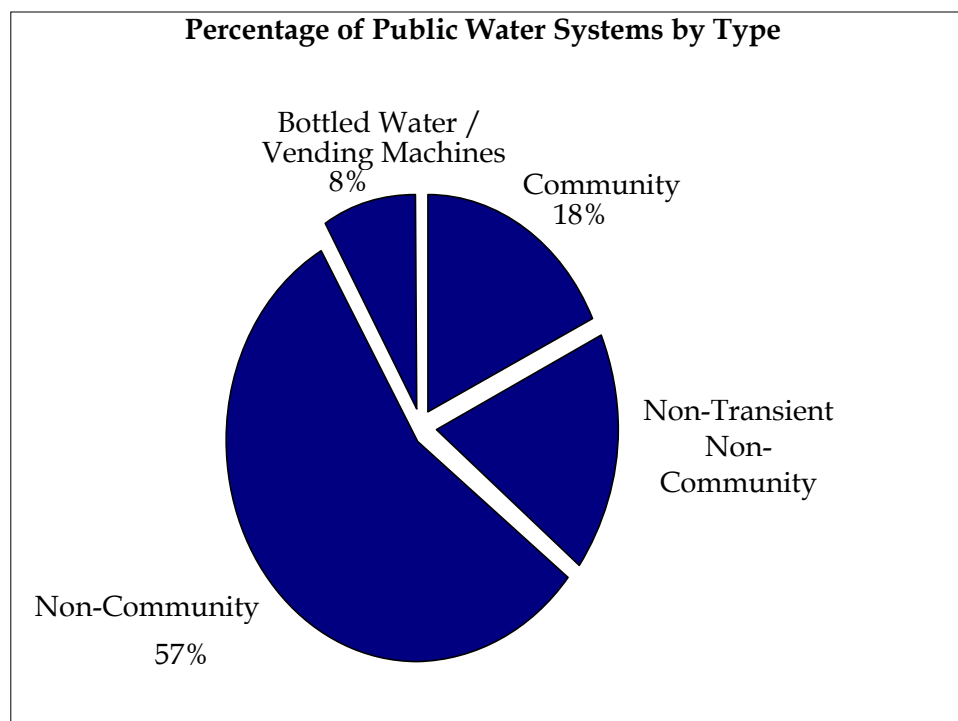
Table 1 – Rate Structure for all Public Water Systems except Bottled Water and Water Vending Machines		
	SFY 2011	SFY 2012
Per capita rate (above base population)	\$0.45	\$0.45
Base fee	\$50	\$50
Maximum fee	N/A*	N/A*
Base population	100	100
* During the 2009 Legislative Session the Legislature removed the maximum fee cap from statute.		

A separate formula and rate structure exists for bottled water facilities and water vending machines. A summary of the rates for these facilities can be found in Table 2 on the following page.

Table 2 – Rate Structure Bottled Water Facilities				
System Type	Description	# of Systems	SFY 2011	SFY 2012
In-State Small	Small (up to 250,000 gallons)	14	\$75	\$75
In-State Medium	Medium (>250,000 to 20 Million gallons)	10	\$225	\$225
In-State Large	Large (>20 Million gallons)	5	\$2900	\$2900
Out-of-State	Out-of-State bottlers selling product in Maine	114	\$300	\$300
Water Vending Machine	Per Water Vending Machine	34	Minimum \$75, \$20 per machine up to \$220 maximum	Minimum \$75, \$20 per machine up to \$220 maximum

During the May 4, 2011 Commission meeting, the MPDWC voted unanimously to not increase the fees for State Fiscal Year 2012, as projected revenues using the current fee structure should be adequate to cover all costs during the State Fiscal Year 2012.

Types of Public Water Systems Regulated by the DWP



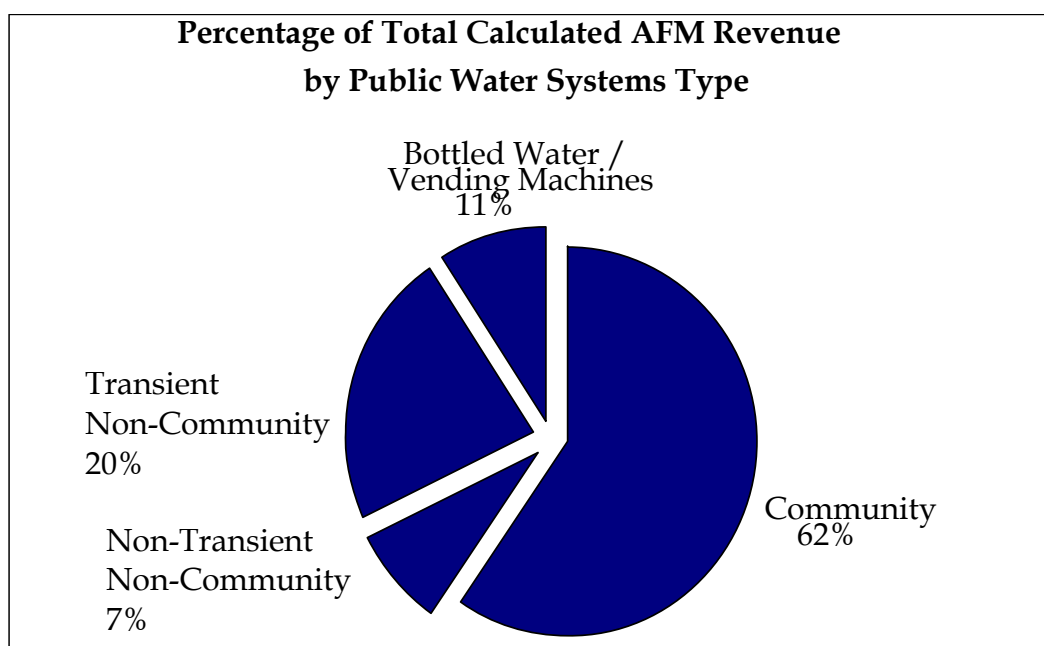
Fee Billings and Collections

State Fiscal Year 2011

Summary of AFM Fee Billings

Data as of April 2011

Types of PWS	Number of Public Water Systems	% of total Public Water Systems	Population Served	Calculated Revenue	% of Total Calculated Revenue
Community	379	18%	663,967	\$ 303,382	62%
Non-Transient Non-Community	361	17%	67,245	\$ 35,772	7%
Non-Community	1,156	57%	184,511	\$ 98,639	20%
Bottled Water / Vending Machines	177	8%	N/A	\$ 52,510	11%
Totals	2,073	100%	915,723	\$ 490,303	100%



Drinking Water State Revolving Fund

The Drinking Water State Revolving Fund (DWSRF) provides financial assistance to public water systems in Maine for infrastructure improvements. From 1997 through 2010, the DWSRF has provided nearly \$168 million in loans and grants to public water systems throughout Maine.

The DWSRF Program in SFY 2011 continued the tremendous success of 2010. In March 2011, Maine became the 5th State Revolving Fund in the nation to reach 100% completion of all American Recovery and Reinvestment Act (ARRA) funded construction projects.

In 2011 Congress reduced the national commitment to the DWSRF program resulting in Maine being eligible of \$9,418,000, a 30% reduction from the 2010 allocation of \$13,573,000.

A significant portion of our State Match of \$1,883,600 will come from a balance of \$1,322,430 from remaining state bond funds and earnings on state match funds that have not been used previously. The balance of \$561,170 will come from the General Fund as part of the SFY 2012 budget appropriation.

During the 2011 Legislative Session under the Leadership of Representative Patrick Flood, the legislature approved a funding mechanism to provide State match for the 10 year period between 2014 and 2023. When the State renews the wholesale liquor contract in 2013, up to 15 percent of the revenue will be used to provide the necessary State Match for the DWSRF and the Clean Water State Revolving Fund.

Providing a stable funding source for State Match will significantly benefit the drinking water industry in Maine by reducing the annual uncertainty regarding the timing when the money will be available as well as reducing the time and effort associated with advocacy.

The method of funding State Match in 2012 and 2013 is yet undetermined.

Maine received over \$36.5 million in requests for the 2011 DWSRF. However, even with the increased allotment, only about \$11 million worth of projects will be funded with the 2011 DWSRF.

In addition to funding construction projects, the DWSRF also funds many other activities approved by the U.S. Environmental Protection Agency including well head protection grants, technical assistance providers, operator training, land acquisition loans, source water protection resources, and 17 staff positions at the Drinking Water Program.

Annual Staff Meeting and Annual Staff Merit Award

The Drinking Water Program annual staff meeting was held on July 28, 2011. Curry Caputo from the Maine Association of Building Efficiency Professionals and Sustainable Structures, Inc. gave an interesting and insightful presentation about residential energy efficiency. Stephen Dickson of the Maine Geological Survey also gave a presentation and provided a great and thought-provoking discussion about climate change in Maine. The staff meeting also included a team building exercise consisting of a game which challenged DWP staff to work together and explore the many important messages we communicate to public water systems everyday.

An announcement and presentation of the Annual Staff Merit Award was also made. This award, given annually by the MPDWC, recognizes an employee of the Drinking Water Program who has made a significant contribution in the past year to the goals and mission of the program. Nominations are solicited and received from the drinking water "community" in Maine, including the DWP staff, other Maine water industry associations, and public water systems.

This year, the Commission was pleased to present the award to Jeffrey Folger. Jeff recently retired from the DWP after over 16 years with the DWP and 32 ½ total years of service to the State of Maine. Jeff was recognized for his many years of hard work and dedication to the DWP and protecting the public health of Maine people.

DWP Program Accomplishments and Goals

Director's Report

Responsibilities

- ◆ Provide program direction and leadership.
- ◆ Develop staffing and budgetary needs to meet primacy requirements.
- ◆ Provide DWP Staff with the resources to effectively perform their work.
- ◆ Set priorities for staff time and resources.
- ◆ Adopt drinking water regulations that are no less stringent than the federal regulations.
- ◆ Adopt and implement adequate procedures for the enforcement of State regulations.
- ◆ Provide technical assistance to PWS to assure compliance with the SDWA.
- ◆ Work with state and federal entities to ensure adequate funding of the DWP.
- ◆ Advocate for Safe Drinking Water.
- ◆ Ensure the state lab's ability to perform analytical measurements of all National Primary Drinking Water Regulations.
- ◆ Work with Department Leadership to maintain and when possible increase support for the DWP.
- ◆ Respond as needed to all proposed legislation that affects the ability of public water systems to provide safe and reliable drinking water.

Accomplishments

- ◆ Beginning in February 2011, the DHHS Drinking Water Program began a series of internal meetings to identify and implement ways to save small businesses money and time while still providing the same public health protection. A few of the ideas that were accepted include:
 - Reducing the required testing frequency of some routine water tests. Cost saving: Approximately \$600,000 over 10 years. (Rule change pending –estimated September 2011)
 - Reduce the water testing requirements for initial approval for some new water systems. Cost Savings: Approximately \$255 per facility (on-time testing requirement). Estimated 25 to 30 facilities per year. (Rule change pending – estimated September 2011)
 - Acceptance of some existing wells rather than requiring the construction of a new well. Affects some facilities where the use of the facility is being converted. Estimated 1 to 3 facilities per year. Approximate savings = \$4,000 to \$8,000 per

well; \$12,000 to \$24,000 per year. (Policy change pending –estimated August 2011)

- Reduce the time frame required to determine the safety of the water when a facility is on a “Boil Water Order”. Cost Savings: Varies depending upon the nature of the business and the reason for the Boil Water Order. (Policy change under development – estimated completion August 2011).
 - Allow some community water systems to post annual water quality reports in the local newspaper rather than printing and mailing the report to each customer: Cost Savings: Varies depending upon the size of the water system. One small community estimated the annual costs savings to be approximately \$1,500. (Effective April 2011)
 - Other ideas are also being considered at this time.
- Applied for 2011 DWSRF grant (\$9,268,000). Award anticipated by the end of July 2011.
 - Published a “White Paper” on alternative State Match funding for the DWSRF Program.
 - Published the second annual DWSRF Construction report.
 - Received annual Public Water System Supervision Grant (\$900,000).
 - Maintained a strong, committed workforce.
 - Continued to foster strong relationships with EPA, state agencies, water utilities, water associations, and non-profit agencies.
 - Maintained compliance with federal primacy requirements.
 - Staff participated on many state and national boards, commissions and workgroups.
 - Worked with other Programs in the Division of Environmental Health to find efficiencies and provide better customer service. Began a process of modifying the Health Inspection license application to integrate the requirements for public water systems and on-site septic systems. This will streamline the process for applicants as well as the internal process for handling applications.

Goals

- Continue to implement the Safe Drinking Water Act. The DWP will continue to be creative and efficient. In particular, we will compare the work we are doing with our statutory authority to ensure we are operating within the authority given to us.
- Continue to work with Division of Environmental Health management team to find efficiencies through inspection and administrative staff.
- Work with contractors and other water industry partners to improve outreach and technical assistance to public water systems.
- Work with the Drinking Water Commission to support initiatives of the DWP.
- Maintain and promote good staff morale.
- Provide staff with the necessary resources and support so they can accomplish their work.
- Provide excellent customer service.
- Maintain and foster strong alliances and working relationships which further DWP goals.

- ♦ Strive for Continuous Program Improvement.
- ♦ Continue to shape state and national drinking water policy.

Compliance and Enforcement Team

Responsibilities

- ♦ Administer and enforce all State and Federal safe drinking water rules and regulations promulgated from the Safe Drinking Water Act and Maine Water for Human Consumption Act, including the Maine Rules Relating to Drinking Water (10-144 CMR 231) and the Code of Federal Regulations (40 CFR 141, 142, and 143).
- ♦ Adopt New EPA Regulations and File the necessary Primacy Packages.
- ♦ Administer and Enforce the State of Maine Rules Relating to Bottled Water, Bulk Water, and Water Vending Machines.
- ♦ Identify any rule violations, input appropriate violation data, and notify public water systems of such violation(s) through notices of violation, notices of noncompliance, consent orders, compliance orders and notices of penalty assessment.
- ♦ Create and change monitoring schedules for public water systems.
- ♦ Train public water system owners and operators on new, existing, or upcoming rules and procedures.
- ♦ Review water quality and monitoring data from public water systems and bottled water producers and sellers, to determine contaminant levels, appropriate collection and analysis times, as well as sampling methods..
- ♦ Review s submitted reports like monthly operating reports and consumer confidence reports.
- ♦ Issue and Remove Boil Water Orders, Boil Water Advisories and Do Not Drink Orders.
- ♦ Track water quality results for new source/system approval.
- ♦ Conduct watershed inspections and review watershed reports.
- ♦ Communicate and collaborate, internally and externally, with DWP staff and State and federal agencies and stakeholders regarding any relevant compliance and enforcement information associated with public water system issues, applications, or reviews.
- ♦ Review and approve or deny treatment installation plans affecting water quality.
- ♦ Review and approve or deny sampling plans
- ♦ Review and approve or deny synthetic organic compound waivers applications, which can save public water systems hundreds of dollars in testing costs.
- ♦ Enforcement staff draft, negotiate, and revise formal enforcement actions.
- ♦ Enforcement staff works directly with public water systems and other state agencies to explain and resolve formal enforcement actions related to violations of the SDWA, collect AFM fees, assist with posting public notification and negotiate terms for returning to compliance.
- ♦ Enforcement staff refers any recalcitrant public water systems to the Maine Attorney General Office and provide testimony, background, and technical expertise for administrative and civil hearings.
- ♦ Enforcement & Rulemaking Coordinator oversees and ushers all proposed rule changes within the Division of Environmental Health through internal approval, advertising, public hearing, and the adoption process.

- Enforcement & Rulemaking Coordinator oversees all public requests for information and ensures compliance with Maine's Freedom of Access Act.

Accomplishments

- Compliance and Enforcement Team members continued their work participating in task forces (subgroups) to address areas of the program identified as needing improvement, including clarifying roles and responsibilities within the DWP; expediting enforcement efforts against public water systems; setting and following through with goals and measurements; developing methods to consistently update and purge written documents; and securing and improving database reliability and automation, consistency, and accuracy.
- Enforcement staff provided input on EPA's Enforcement Targeting Tool (ETT), designed to prioritize unaddressed public water systems with health-based violations.
- Compliance staff provided input on EPA's National Advisory Committee on proposing changes to the Total Coliform Rule.
- Compliance officers participated in a series of trainings to assist public water systems with complying with existing and upcoming regulations affecting their systems, including, but not limited to, the Arsenic Rule, Opening for the Season, Lead/Copper Rule, and the Groundwater Rule.
- Compliance staff adeptly responded to a number of drinking water emergency calls and events, resulting from weather disasters, lack of water, acute contamination and treatment failures.
- Prepared for revision and update of the *Rules Relating to Drinking Water* (10-144 CMR 231).
- Compliance and enforcement staff provided thoughtful feedback and input on all proposed policies and procedures by DWP staff and worked to ensure that final policies first protected public health and then improved workplace efficiencies.
- Trained certified labs on reporting results electronically, which will improve data reliability.
- Continued to improve the process of receiving information from public water systems, communicating that information to all appropriate staff, and storing it in an easily retrievable format, when necessary.
- Improved communication internally within the DWP to present a consistent message to public water systems.
- Provided refresher trainings for existing compliance staff on regulations and SDWIS.
- Applied to EPA for primacy for the Groundwater Rule.

Goals

- Implement proposals for expedited and more effective administrative enforcement, including imposing collection fees for public water systems failing to collect samples in the required timeframes, posting a list of public water systems in violation of particular violations, rewarding public water systems in compliance, along with other efforts that will encourage public water systems to be in compliance. One effort will entail a pilot project of the 25 worst transient offenders, in order to test the Program's procedure for tracking and implementing imposing collection fees for samples missed.

- Work with the Information Management Team to develop stronger tracking efforts in compliance follow-up.
- Work with the ETT, offer feedback and determine which public water systems require action first.
- Continue efforts to collaborate with other State agencies to offer a more cohesive message to public water systems and avoid confusion. Specific emphasis will be placed on day care facilities and restaurants.
- Continue to work with data and administrative staff at the Drinking Water Program , on issues that directly affect compliance, in order to maintain data integrity and secure the highest accuracy of rule compliance.
- Update the Enforcement Strategy to better reflect more efficient enforcement efforts to be implemented and incorporate clearer roles and responsibilities for enforcement and compliance staff.
- Update any state rules under the jurisdiction of the DWP that need it. Currently on the agenda are the Rules Relating to Bottled Water, Bulk Water, and Water Vending Machines, Rules Relating to the Licensure of Water Treatment Plant Operators, and Rules Relating to Drinking Water.
- Create updated forms, letters, policies, and standard operating procedures for the new changes to the Groundwater Rule.
- Continue working with all certified laboratories to foster a stronger relationship between labs and the DWP.
- Keep apprised and participate in proposed changes to EPA regulations, such as Revisions to the Total Coliform Rule and the Lead/Copper Rule, Long Term Revisions.

Field Inspection Team

Responsibilities:

- Conduct sanitary surveys and field investigations.
- Oversee new system and new well approval projects for public water supply wells.
- Work with public water systems to complete the process for obtaining a general operations permit.
- Review proposed septic system variances that could impact public water supply sources
- Provide follow up inspections and field technical assistance to PWSs with violations.
- Provide on-site advice and assistance to PWSs regarding operation, maintenance, treatment, quality control, testing waivers and testing requirements.
- Investigate water quality complaints made by the public.
- Provide technical advice to PWSs in emergency situations.
- Provide waterborne disease investigation.
- Investigate requests for deregulation and authorize deregulation of water system as warranted.
- Maintain a Sanitary Survey Priority List.
- Draft, issue, and track Engineering Orders.
- Inform and interact with all other pertinent DWP sections regarding field conditions of PWSs.

- ◆ Provide field assistance on the placement and removal of all Boil Water Orders.
- ◆ Inspect the construction of PWS facilities, both DWSRF and non-DWSRF funded.
- ◆ Conduct watershed inspections.
- ◆ Evaluate water system's operator classification.
- ◆ Ensure PWS compliance to rules pertaining to licensed operators
- ◆ Review and provide comments on preliminary plans and engineering reports for PWSs.
- ◆ Review and approve final plans and specifications for new or modified water facilities.
- ◆ Provide engineering assistance and guidance to PWSs.
- ◆ Provide assistance and guidance on optimization of treatment processes.
- ◆ Review and approve all requests for waivers of main separation requirements and tank painting/coating.
- ◆ Review and approve all requests for waivers to the 300 foot setback requirement between a PWS well and septic leach field.
- ◆ Review and provide input on the approval of requests for waivers to the 1000 foot setback requirement between a PWS well and Underground Storage Tanks (USTs).
- ◆ Develop and maintain controlled documentation of pertinent policies and standard operating procedures.
- ◆ Conduct facility reviews and evaluate the ability of systems, both engineered and non-engineered, to provide safe and reliable drinking water to the public. Facility evaluations include sanitary surveys; new system and new well approval projects from preliminary approval through final system approval; records, data, performance reviews; and engineering inspections.
- ◆ Engineering enforcement actions are initiated and tracked as necessary.
- ◆ Conduct routine inspections of public water systems throughout fiscal year.
- ◆ Conduct additional inspections in response to violations, customer complaints, known health threats, siting and approving new public water supply wells and their water systems, or at the request of the system.
- ◆ Field Engineers oversee DWSRF projects as they proceed through the construction phase, starting with a preconstruction meeting and contract signing. During the construction phase, projects are inspected monthly in conjunction with pay requisition meetings. At the end of a project, an inspection is done to verify substantial completion and final pay requisitions.
- ◆ Review and evaluate new and emerging technologies, preliminary and final water system plans and specifications, engineering studies, engineering orders and pilot projects.
- ◆ Provide technical assistance to consulting engineers and public water systems regarding engineering issues. Inspect all facilities construction in a timely manner.

Accomplishments

- ◆ In this fourth year after the DWP restructuring of 2006, the Field Inspection Team continues to see a reduction in the number of sanitary surveys due at any given time. Individual sanitary survey goals have been given to each inspector and results are reviewed on a quarterly basis.
- ◆ Approximately 383 sanitary surveys of public water systems were completed along with 1299 other field visits relating to various activities including new system or well

approval projects, sample rechecks, construction inspections, boil water orders, and miscellaneous events.

- Emergency responses, investigations, water system inspections, follow up inspections for Total Coliform Rule violations and the issuance of engineering orders were performed.
- Maintained the Electronic Field Manual which includes all pertinent policies and procedures related to field inspection activities. The manual is controlled and available for downloading onto electronic equipment brought into the field.
- Participated in the development or revision of several DWP policies including the Multiplication Factors Policy, Source Water Sampling and Tap Installation Procedure, Model Cross Connection Control Program for Non PUC Regulated Maine PWS.. Drinking Water Orders Policy, Setback Policy
- Field Inspectors oversaw the issuance of General Operations Permits for Community and Non Community – Non Transient public water systems that are new or have substantially changed their operation after October 1st, 1999.
- During sanitary surveys, field inspectors verified that public water systems have designated operators with licenses that are commensurate with the operational class of the system.
- During the 2011 fiscal year, the DWP received the annual \$12.5 million DWSRF grant. The DWP was able to fund 17 drinking water related construction projects ranging from \$97,000 to \$2.5M in scope. Four field inspectors worked as project managers to oversee these projects to ensure that projects were constructed to safe drinking water standards and to verify that funds were spent appropriately for these projects. These projects involve: new sources or source modification, new storage facilities, new treatment or treatment modifications, and major transmission and distribution main work.
- Completed the plan review process for numerous water system projects.
- Completed watershed inspections on the State's water systems that have filtration avoidance approvals.
- The DWP's computer database records were updated to include information gained as a result of sanitary surveys and other inspections.
- Technical assistance activities continued to be enhanced through the use of documented policies and procedures. These have allowed the field staff to consistently and efficiently administer SDWA rules and State of Maine Rules Relating to Drinking Water.

Goals

- Continue to perform sanitary surveys on regulated water systems based on a three-year/five-year rotation plan.
- Continue to monitor data on sanitary survey completion.
- Provide review and approval of new public water supply wells and water systems.
- Review septic setback waiver requests to ensure public health is protected.
- Review underground storage tank (UST) setback waiver requests to ensure public health is protected.
- Perform annual inspections of all surface water source systems with filtration waivers.
- Provide on-site technical assistance to small water systems.
- Provide on-site training to small water system operators.

- Complete construction inspections on all projects submitted for review.
- Respond to emergency situations including boil water orders.
- Conduct rechecks sampling for routine coliform positive samples.
- Complete plan reviews within 30 days of receipt of all necessary review information.
- Oversee the issuance of General Operations Permits.
- Oversee and review the application of the Cross Connection Rules.
- Incorporate future EPA regulations into the review process.
- Ensure compliance with DWP rules regarding requirements of final plans and specifications submission and approval prior to the initiation of construction of water facilities by PWSs.
- Complete inspection forms for all construction inspections on DWSRF funded and non-DWSRF projects.
- Continue New System Approval work on Manufactured Housing Communities.
- Review, update, and modify, as necessary, all databases.
- Continue to use documentation control best practices with DWP policies and SOPs.
- Continue development of the DWP staff of eight field inspectors for both new system/well approval and field inspection work.

Water Resources Team

The Water Resources Team provides technical assistance, outreach and training for DWP staff, Public Water Systems, and the public. Areas where we focus that assistance include Water Operator and Well Driller licensing, System Capacity Development assessment and improvement, Security, Source Protection, and new regulations. We also work with the Subsurface Wastewater Unit, and provide them with direction.

Responsibilities

- Participate in Maine's Board of Licensure of Water Treatment Plant Operators. This includes administration of exams and reviewing training courses for relevancy.
- Provide DWP support to the Board of Licensure of Water Treatment Plant Operators for license renewal, tracking of required training and examination process. (See annual Operator Certification Report for details.)
- Organize and conduct training for PWS owners, operators, and supervisors.
- Ensure that DWP personnel receive appropriate training related to their current and anticipated duties.
- Assist Field Inspection Team in evaluating water systems classification.
- Assist Field Inspection Team in assessing water system compliance with licensed operator requirements.
- Provide guidance and direction to MRWA's circuit riders. Administer charges to DWSRF 2% Technical Assistance
- Perform Environmental Review for DWSRF funded projects and prepare an Environmental Assessment.
- Review DWSRF recipient systems' technical, financial and managerial procedures to address system capacity
- Inform PWS management of methods to improve capacity development.
- Utilize and monitor the Security Grant to assist the DWP and Public Water Systems in improving their security and emergency preparedness (See Security Grant reports for details).

- Disseminate *Emergency Action Plans* to assist systems in the development of plans for water system emergencies.
- Participate in the development of intrastate and interstate Water/wastewater Agency Response Networks, (WARN).
- Represent the DWP on the WARN Steering Committee as an associate member.
- Utilize and monitor the ERG grant to assist in training and administration of water operators. (See ERG grant reports for details).
- Manage and administer the Water Well Drillers' and Pump Installers' Board.
- Provide technical assistance and review for public water systems that provide fluoridated water.
- Continue to implement a Source Water Assessment and Protection Program for Maine.
- Operate and maintain the DWP Geographic Information System.
- Make source water protection and security information available in appropriate forums, including the Internet.
- Provide maps depicting source water protection areas and water resource features to utilities, all affected municipalities, consultants, and others.
- Encourage and facilitate source water protection activities of public water systems.
- Market and administer the Land Acquisition Loan Program
- Administer Maine's Wellhead and Source Water Protection Grant Programs.
- Administer the Capacity Development Grant Program.
- Coordinate the DWP education and outreach program, including exhibiting at conferences, publishing a quarterly newsletter and maintaining the DWP website.
- Update and maintain the Subsurface Wastewater Rules to provide protection for public health and groundwater quality.
- Manage the Licensure of Site Evaluators.
- Coordinate and conduct training for Local Plumbing Inspectors, Code Enforcement Officers, and Licensed Site Evaluators with the State Planning Office.
- Provide support for and review of municipal programs for internal and external plumbing permits.
- Provide technical assistance, training, and interpretation of rules for municipalities.

Accomplishments

- Assisted the MEWARN in developing promotional materials and a website.
- Achieved 95 percent compliance rate for the 732 PWS required to be operated by a licensed operator.
- Operator training credit tracking process in-place.
- Continued to provide opportunity for examination preparatory classes in order to increase operator availability.
- Conducted 8 capacity reviews for DWSRF loan applicants.
- Reimbursed 4 systems for projects through Capacity Development Grants; 21 projects are ongoing.
- Provided technical support for the general operations permitting process and operator compliance to the Field Inspection Team.
- Completed 11 environmental reviews in SFY 2011.
- Worked with the Maine Conservation Corps to hire staff to conduct assessments of public water supplies brought on line since the completion of the assessments in 2003, and to work with those systems to develop source protection plans.

- Worked closely with the MECDC Oral Health Program to enhance water operator understanding of water fluoridation and increase monitoring and compliance with fluoridation rules.
- Increased communication with county emergency management agencies to help identify public water system strengths and weaknesses in developing and maintaining water system emergency preparedness plans.
- Developed templates for small system Emergency Action Plan.
- Worked with the Well Driller's Board to obtain legislative authorization to regulate geothermal well installation, and began the process of writing regulations.
- Processed consumer complaints, unlicensed practice investigations, and examinations of new well drillers for the Well Driller's Board. Worked closely with the DWP on the installation of proposed public water supply wells.
- Approved \$78,090 in Wellhead Protection Grants
- Approved \$50,000 for land acquisition to protect drinking water sources, including major projects involving collaboration with the Trust for Public Land.
- Distributed the *Service Connection* newsletter quarterly to more than 4000 readers
- Continued the process of transitioning the DWP's quarterly newsletter, the *Service Connection*, to an electronic transmission to enable improved and upgraded design capabilities and save resources.
- Maintained DWP website to highlight rule changes, emergency information and resources for public water systems
- Exhibited at Maine Municipal Association Annual Conference, Maine Water Utilities Association Annual Trade Show, and Maine Rural Water Association annual conference to promote safe drinking water and network with public and private stakeholder groups.
- DWP staff members provided training to students in water/wastewater managerial preparation classes concerning regulations related to drinking water systems.
- Provided regular monthly oversight and direction to MRWA Water Quality Specialists (WQS) funded by the DWSRF technical assistance set-aside. With closer targeting and oversight, the WQS conducted 916 site visits. The site visits help water systems with violations, operator licensing, trouble-shooting, installing, and operating treatment systems.
- Worked with public water suppliers, Maine Rural Water Association, Maine Water Utilities Association, The Wells National Estuarine Research Reserve, Maine NEMO, as well as other state agencies to facilitate the implementation of the recommendations resulting from the assessments. We are working with the State Planning Office to provide source protection education and information to municipal officials.
- Completed site visits and provided System Design Capacity determinations to fifty public water systems for the water flow and level requirements associated with DEP Chapter 587.
- Our staff members serve on several Association of State Drinking Water Administrators (ASDWA) committees that work with other states, EPA, and professional organizations to develop guidance, build comments and perform studies for small system operations, security initiatives, water resource vulnerabilities and revisions to the Total Coliform Rule.
- Staff represents EPA Region I on the Groundwater Protection Council's National Board.

- Conducted a workshop with the State of New Hampshire and Piscataqua Regional Estuarine Project for an interstate planning process to improve protection of the Salmon Falls watershed, a drinking water source for both states. Working toward implementation of recommendations from the workshop.
- Completed the rulemaking process to revise and update the Subsurface Wastewater Rules
- Utilized a system to track education and outreach message delivery and materials development to measure effectiveness and shape future education and outreach actions.
- Joined the Kennebec Woodland Partnership to assist in development and maintenance of the forest economy to protect drinking water quality.
- Instituted a new Source Water Protection Grant for surface water systems, and provided a common application form and period for Capacity, Wellhead and Source Water Grants. Received a record number of requests for all grants.
- Developed, organized, and published the Annual DWSRF Project report to highlight the importance and value of the DWSRF to public water systems in Maine

Goals

- Continue to maintain DWP data in the DEP's Google Earth/Google Maps application, providing downloadable GIS data to suppliers, municipalities, and the general public with appropriate security screening.
- Continue to implement the Trust for Public Land recommendations for improving the fabric of water supply protection in Maine.
- Develop alliances with land conservation groups and regional planners to encourage good land use planning leading to more effective source protection.
- Continue and expand education and outreach efforts to assist both water suppliers and municipalities in making good land use decisions in source water protection areas.
- Provide support and coordination with DEP, Land Use Regulation Commission, and other state agencies to assure that source water protection issues are considered in their permitting processes.
- Emphasize the need for active management plans in wellhead protection areas in source approval, waiver review, and consultation with systems.
- Continue to use the Capacity Development Strategy Implementation Plan.
- Continue to streamline the environmental review process while maintaining a high integrity.
- Support the Board of Licensure of Water System Operators in their actions to maintain the professionalism of the water operator license.
- Provide staff and logistical assistance to the Well Drillers' and Pump Installers' Board, administering the examination, licensing, complaint, and discipline process.
- Assist training organizations in the development and approval of relevant training for water system personnel.
- Develop outreach programs by staff to increase operator knowledge concerning regulatory requirements.
- Provide DWP staff members with training pertinent to their job performance and relationship to water system operations.
- Involve the Water Operator Board to make improvements to clarify operator responsibility in system compliance matters.

- ◆ Continue to aid community and non-transient, non-community systems in retaining appropriately licensed operators.
- ◆ Ensure systems requiring licensed operators have satisfactory coverage.
- ◆ Administer the Operator ERG with effort being placed on continuing education.
- ◆ Continue oversight of MRWA Circuit Rider program.
- ◆ Continue to improve and streamline the Grant administration process.
- ◆ Continue conducting DWSRF capacity reviews for capital projects.
- ◆ Continue conducting capacity reviews of those systems identified as particularly needing TFM capacity development improvements.
- ◆ Continue to provide capacity development grant money to assist systems in maintaining or improving TFM capacity.
- ◆ Work cooperatively with the PWS and the DWP compliance section to bring non-compliant systems into compliance.
- ◆ Enhance the capacity review documentation to address differences in system types and needs.
- ◆ Continue to balance the improvement of the human environment through safe and adequate water systems with the protection of natural, historical and cultural features.
- ◆ Finalize a procedure to address historical Significant Non-compliers through capacity development.
- ◆ Provide technical assistance in the form of operator training and directed workgroups.
- ◆ Work with the Board of Licensure of Water System Operators to improve success for water operator examinations.
- ◆ Support industry efforts to address water operator workforce sustainability.
- ◆ Continue to collaborate with professional organizations and State agencies that concentrate on post secondary and job training.
- ◆ Continue a presence on MWUA, NEWWA, JETCC, and other professional organization committees to enhance training opportunities and capacity development awareness.
- ◆ Continue working with PWS's to improve their emergency preparedness through interactive exercises.
- ◆ Participate in the development of the Maine WARN and an Interstate WARN.
- ◆ Raise awareness of emergency response procedures to all PWS.
- ◆ Continue system outreach to assist systems in developing Emergency Action Plans, partner with the Department of Education to disseminate information to schools for inclusion in their all hazard plans.
- ◆ Continue to work towards an electronic publication of DWP's quarterly newsletter, the *Service Connection*.
- ◆ Continue using the tracking system to track education and outreach message delivery and materials development and expand its use to entire DWP.
- ◆ Implement a pilot program to test integrated outreach for small community systems, combining source protection, capacity, and emergency preparedness into one implementable package.
- ◆ Complete and distribute a Business Owners Handbook for public water systems.
- ◆ Continue to develop, organize, publish, and improve the Annual DWSRF Project report to highlight the importance and value of the DWSRF to public water systems in Maine

- Evaluate, re-organize, and make improvements to the DWP website to make the site more user-friendly, easier to navigate, and more comprehensive to include up-to-date information on rules, policies, news, technical assistance, education, training, resources, and procedures of the DWP.

Information Management Team

Responsibilities

- Manage data flow into the DWP, both electronically and by hard copy - this includes incoming and outgoing mail, sample data, MOR data, GIS data, AFM payments, etc.
- Manage and maintain Document Imaging system.
- Create and maintain database and GIS applications to support all functions of the DWP.
- Manage financial aspects of the DWP.
- Manage QA/QC processes of all DWP data.
- Manage New Source Approval / New Well Approval processes, including tracking and coordination between DWP personnel and other State agencies.
- Provide quarterly data to EPA.
- Run queries and provide data to EPA contractors, Maine CDC, other State agencies and for FOIA requests.
- Manage the Source Water Assessment program, including creating SWAP reports and maps.
- Create maps as requested by PWS and towns.
- Provide technical support and training to DWP staff for SDWIS, GPS units, and other technology.

Accomplishments

- Continued Implementation of Document Imaging system (Kofax /Orbit) to replace paper files.
- Assisted staff in becoming familiar with SDWIS Web application. Maintaining production database on the enterprise server.
- Provided cross training to IMT staff for better coverage of all IMT duties.
- Expanded on existing training and guidance documents to staff (mostly FIT/CET) for SDWIS Web use.
- Worked closely with the Health Inspection Program and Department of Agriculture to identify PWSs that are under their regulation.
- Maintained quarterly EPA reporting.
- Worked with the State Health and Environmental Testing Lab (HETL) staff to refine PWS sample kit shipping and sample data transfer processes.
- Provided private and utility labs with files and guidance documents to assist them in implementing electronic sample data transfer.
- Developed an MS Access application to provide to small private and utility labs that will give them the ability to enter sample data and automatically create a properly formatted electronic sample data file to provide to the DWP. The MS Access application is almost complete and is expected to be in use by the end of 2011.

- Began running Compliance Reports as support to Compliance Staff. As part of this process, IMT staff also began doing preliminary data investigation on the Compliance Reports.
- Implemented a temporary position within the Information Management Team to increase the support provided to the Compliance and Enforcement Team. Because we cannot create any new State positions, we have created a new position called an "Assistant Information Analyst."
- Continued to increase QA /QC of DWP data in all applications, including SDWIS. QA /QC of Legal Entities data has led to a significant decrease in returned mail on mass mailings.
- Provided training and support to FIT and CET groups in a variety of areas, including use of SDWIS.
- Eliminated the contract Administrative Support position to assist with Administrative tasks, data cleanup projects, and Document Imaging.
- Provided support to the ARRA needs for reporting and tracking of projects and spending.
- Provided weekly updates for all DWSRF/ARRA projects
- Improved communication with the MMBB.
- Developed a new application to automatically create Consumer Confidence Data Reports to provide to Community systems.
- Developed a Request for Proposals seeking proposals for consultant services for the Maine Drinking Water Program to provide on-site inspections of municipal and commercial analytical laboratories and proficiency testing evaluation services.
- Continued to work with SAIC to upgrade ESS Web for sanitary surveys.

Goals

- Maintain or increase the same level of service to the program, recognizing changes in staff and added responsibilities. Identify creative and more efficient ways to manage/QC/enter data to reduce overall staff time. Use contract labor as necessary to manage workload.
- Prepare for next SDWIS upgrade to implement the GWR changes and SDWIS updates. Provide training to staff in added SDWIS functionality for the GWR.
- Continue working with HETL to reduce the amount of rejected samples from electronic sample data transfer.
- Complete imaging the backlog (old) files in the file room with a goal of getting all the DWP's files into the Orbit Imaging Viewer.
- Make improvements to all DWP supporting applications (including the Shipping File process, HETL sample data import, AFM, Field Data, SRF, etc.).
- Explore the use of SQL server as a replacement to MS Access, for DWP supporting applications. This may allow us to provide better access to supporting applications for DWP staff in field offices.
- Continue cross training of IMT staff for better coverage of all functions.
- Create and maintain SOP documents for all IMT functions.
- Continue assistance to private labs for electronic sample data transfer, with a goal of 100% of labs submitting samples electronically by SFY 2012.
- Maintain/increase QA/QC of all DWP data, including lab samples (units of measure, correct sample points), Inventory data, and Legal Entity data.

- Implemented running Failure to Monitor Compliance Reports as support to Compliance Staff, from running the reports and doing data investigation, through printing and mailing the letters.
- Maintain routine GIS updates.
- Continue working with SAIC and OIT to finalize upgrade to SDWIS Web 2.3 for added GWR functionality and ESS capabilities.
- Improve timeliness of Federal Violations Reporting.
- Continue creating SWAP reports for all PWSs that have not been assessed, and moving toward providing a report as each new system or well is brought online.
- Continue to provide support and training to DWP staff, including training for SDWIS Web 2.3 GWR functionality.
- Priority rank all New Source Approvals / New Well Approvals.
- Enhance the SRF application to priority rank project submissions for funding.
- Work with EPA and their SDWIS contractor, through conference calls and webinars, to provide input for SDWIS NextGen functionality.

Laboratory Certification and Capability

Responsibilities

- Issues laboratory certificates that clearly reflect the analytical capabilities of participating laboratories.
- Provides technical assistance that results in improved quality and defensibility of analytical data generated by laboratories for use in the DWP.
- Develops, reviews and revises State rules and regulations for laboratory certification to clearly reflect consistency with the *"Manual of Certification of Laboratories Analyzing Drinking Water"* and recognized national standards on laboratory quality management systems.
- Evaluates laboratory PT results to determine compliance with rule requirements.
- Maintains the electronic files which contain applications, certificates, audit reports, PT results and correspondence for all laboratories.
- Participates actively in the development of a national laboratory standard.

Accomplishments

- Provided training and technical support to laboratories and the DWP on laboratory issues.
- Processed applications for certification and generated initial, renewal and replacement certificates for regulated laboratories.
- Tracked laboratory results of PT samples.
- Maintained the computer database of certified laboratories, including a web posting of certified laboratories list on the DWP web site.
- Maintained the central files which contain applications, certificates, audit reports and correspondence for all laboratories.
- Assisted laboratories to stay in compliance by publishing guidance documents that interpret Department rules and analytical methods.
- Maintained Standard Operating Procedures for Laboratory Certification.

Goals

- ♦ To continue all ongoing operational details as mentioned above.
- ♦ To continue implementation of the new laboratory certification rule.

Appendix A

Maine Drinking Water Program Alternative Funding Mechanism Five Year Budget Projection

Position / Expense Category	<u>Actual</u> FY2003	<u>Actual</u> FY2004	<u>Actual</u> FY2005	<u>Actual</u> FY2006	<u>Actual</u> FY2007	<u>Actual</u> FY2008	<u>Actual</u> FY2009	<u>Actual</u> FY2010	<u>Estimate</u> FY2011	<u>Estimate</u> FY2012	<u>Estimate</u> FY2013	<u>Estimate</u> FY2014	<u>Estimate</u> FY2015
Office Asst II - Dan T (50%)									13,660	14,321	14,321	14,894	15,489
Envir. Specialist III - Danielle (50%)									23,441	24,575	24,575	25,558	26,581
Envir. Specialist III - Greg (50%)									23,143	24,263	24,263	25,234	26,243
Office Spec I - Carla (50%)									18,094	18,970	18,970	19,728	20,518
Envir. Specialist III - Kate (50%)									22,251	23,327	23,327	24,260	25,231
Envir. Specialist III - Dawn (50%)									23,143	24,263	24,263	25,234	26,243
Envir. Specialist III - Haig (50%)									23,143	24,263	24,263	25,234	26,243
Envir. Specialist III - Jeff (50%)									23,143	24,263	24,263	25,234	26,243
Envir. Specialist IV - Robin (50%)									22,647	23,743	23,743	24,693	25,681
Asst Envir. Engineer - Larry (50%)									26,933	28,237	28,237	29,366	30,541
Total Salaries	165,227	187,789	157,846	184,015	180,062	203,693	223,255	214,972	219,600	230,225	230,225	239,434	249,012
Fringe Benefits	83,172	96,685	86,644	106,748	102,741	125,876	137,112	122,176	124,619	127,112	129,654	132,247	134,892
Travel	9,004	9,209	2,374	16,420	3,465	2,997	4,451	3,426	3,426	3,426	3,426	3,426	3,426
Training	-	775	702	1,200	692	-	-	-	-	-	-	-	-
Office Equipment/Computers	9,131	4,683	19,319	6,044		-	-	-	-	-	-	-	-
Office Space (Rent, Utilities, MIS)	15,896	21,640	21,235	12,591	39,129	19,822	31,932	27,127	30,554	31,471	32,415	33,387	34,389
Supplies	424	5,160	4,911	3,498	1,047	2,022	158	992	2,652	2,732	2,814	2,898	2,985
Information Technology	-	973	-	40	12,935	22,186	30,285	12,322	12,322	12,568	12,820	13,076	13,337
Contracts						17,906	3,947	85					
Indirect Cost	2,607	2,138	2,306	2,350	3,282	2,636	36,595	55,329	55,329	56,436	57,564	58,716	59,890
Total Expenses	285,463	329,052	295,338	332,907	343,352	397,139	467,735	436,429	448,502	463,970	468,918	483,185	497,931
Other Sources						43,148							
AFM Fees Billed/Collected	285,785	327,305	302,820	289,694	306,236	389,513	419,242	409,468	490,439	490,439	490,439	490,439	490,439
Total Revenues	285,785	327,305	302,820	289,694	306,236	432,661	419,242	409,468	490,439	490,439	490,439	490,439	490,439
	179,061	179,382	177,635	159,951	116,737	79,622	113,628	65,135	38,173	80,110	106,579	128,100	135,354
Annual Surplus / (Deficit)	322	(1,747)	7,483	(43,213)	(37,116)	35,522	(48,493)	(26,962)	41,937	26,469	21,521	7,254	(7,492)
AFM Carryover	179,382	177,635	185,118	116,737	79,622	113,628	65,135	38,173	80,110	106,579	128,100	135,354	127,862
AFM Fee History													
Per Capita Rate	0.30	0.30	0.30	0.30	0.30	0.40	0.40	0.40	0.45	0.45	0.45	0.45	0.45
Minimum Fee	35.00	35.00	35.00	35.00	35.00	45.00	45.00	45.00	50.00	50.00	50.00	50.00	50.00
Maximum Fee	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000					
Minimum Population	100	100	100	100	100	100	100	100	100	100	100	100	100
Bottled Water Fee	50	(see below)	(see below)	(see below)	(see below)	(see below)	(see below)	(see below)	(see below)	(see below)	(see below)	(see below)	(see below)
Estimated Revenue by Type													
Community					184,087	242,648	244,148	244,148	303,382	303,382	303,382	303,382	303,382
Non-Transient, Non-community					25,667	32,833	33,172	33,172	35,772	35,772	35,772	35,772	35,772
Transient, Non-community					71,043	91,158	91,869	91,869	98,725	98,725	98,725	98,725	98,725
Bottled Water							46,765	46,765	52,560	52,560	52,560	52,560	52,560
Small (up to 250,000 gallons)					750	1,040	1,100	1,100	1,100	1,100	1,100	1,100	1,100
Medium (250,000 to 20 million)					1,050	2,400	2,350	2,350	2,350	2,350	2,350	2,350	2,350
Large (over 20 million gallons)					6,000	7,800	15,665	15,665	17,597	17,597	17,597	17,597	17,597
Out-of-State					20,200	27,300	27,320	27,320	31,183	31,183	31,183	31,183	31,183
Water vendors (Min. \$50 Max. \$150)					510	420	330	330	330	330	330	330	330
Total Estimated Revenue (AFM Fees Billed)				309,631	309,307	405,599	415,954	415,954	490,439	490,439	490,439	490,439	490,439